

THE HONORABLE RICARDO S. MARTINEZ

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

QUNESHIA RAWLS, individually and on  
behalf of all others similarly situated,

Plaintiffs,

v.

CONVERGENT OUTSOURCING, INC.,

Defendant.

Case No. 2:20-cv-01538-RSM

**JOINT STIPULATION TO EXTEND  
DEADLINE FOR DEFENDANT TO  
RESPOND TO PLAINTIFF'S  
COMPLAINT AND TO EXTEND CASE  
MANAGEMENT DEADLINES**

**I. STIPULATION**

Pursuant to LCR 7(j), Plaintiff QUNESHIA RAWLS, through her counsel, Frank Freed Subit & Thomas, LLP and Anderson Alexander, PLLC., and Defendant CONVERGENT OUTSOURCING INC., through its counsel Jackson Lewis P.C., hereby stipulate and jointly move this Court for an order under LCR 7(j) extending the deadline for Defendant to file and serve its Response to Plaintiff's Complaint from November 20, 2020, to December 4, 2020, and extending all other case management deadlines by two weeks.

This Stipulation is based upon the following, and the parties agree:

1. That this is the first request for an extension of time.
2. That this request is made in good faith and not for the purpose of delay.
3. That nothing in this Stipulation, nor the fact of entering the same, shall be construed as waiving any claim and/or defense held by any party.

**IT IS SO STIPULATED.**

DATED this 19th day of November, 2020.

FRANK FREED SUBIT & THOMAS LLP

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**II. ORDER**

Pursuant to the above stipulation, it is SO ORDERED.

DATED this 19<sup>th</sup> day of November, 2020.



**RICARDO S. MARTINEZ**  
**CHIEF UNITED STATES DISTRICT JUDGE**

4819-8710-1138, v. 1